

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

WILLIAM ANGELESCO

Criminal No. 19-10444-NMG

Defendant.

JOINT MEMORANDUM FOR INITIAL STATUS REPORT

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(a).

1. Status of Automatic Discovery and Any Pending Discovery Request

On December 20, 2019, the government produced automatic discovery as required under the Local Rules.

2. The Timing of Any Additional Discovery to be Produced

The government will make such further and pre-trial disclosures as are required by law.

3. The Timing of Any Additional Discovery Requests

The defendants have not indicated whether they will request any further discovery.

4. The Timing of Pretrial Motions

The defendant will advise the Court when he is prepared to file substantive motion after he has had a chance to review the discovery provided by the government.

5. The Timing of Expert Witness Disclosures

The defendant requests expert discovery pursuant to Fed. R. Crim. P. 16(a)(1)(G) and the parties request that the Court order that such discovery be produced no later than 60 days prior to trial in this matter, with reciprocal discovery to be produced no later than 30 days before trial.

8. Excludable delay

The parties jointly ask the Court to exclude the time from January 21, 2020 until the date of the next status conference, under 18 U.S.C. § 3161(h)(7)(A), because the parties have needed the time, and continue to need the time, to produce and review discovery in this case. The ends of justice served by this exclusion outweigh the interests of the public and the defendants in a speedy trial.

8. Final/interim status conference

The parties ask the Court to schedule an interim status conference in approximately 90 days.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

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WILLIAM ANGELESCO
By his attorneys,

/s/ Carmine Lepore
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